

When surrounded by regulatory terminology, some of us (meaning me) sometimes begin to question the language and vocabulary skills that we have long believed ourselves to have. One example of this phenomenon can be found in the term “overpack”. Online dictionaries typically define “overpack” as a verb meaning “to pack too many items into (a container)” (suspiciously suggesting the suitcase I travel with when training), or the more helpful “to pack into an overpack”. When “overpack” is searched as a noun, the results tend to default to “pack” and become far more colorful, including “a bundle made up and prepared to be carried; especially, a bundle to be carried on the back”, “a load for an animal”, and (my personal favorite) “a group of Cub Scouts”.

While these definitions are all well and good – for those of us in the dangerous goods transportation world the noun “overpack” is nicely defined by IATA as “an enclosure used by a single shipper to contain one or more packages and to form one handling unit for convenience of handling and stowage”. 49 CFR provides a similar definition in §171.8 as “except as provided in subpart K of part 178 of this subchapter, means an enclosure that is used by a single consignor to provide protection or convenience in handling of a package or to consolidate two or more packages.” (Okay, maybe it’s just me, but my investigation into subpart K of part 178 revealed to me no further enlightenment regarding overpacks, so for now I’ll just take the rest of the definition at its word.)

Just by writing this, I feel somewhat self-vindicated for being initially confounded by “overpack” when I first started using the DG regs, despite the very handy definitions provided to me. At the time, I had to clarify the term in my own mind by thinking of it as “a package over a package” (an explanation I considered all the more brilliant because I thought I CAME UP WITH IT).

As a DG trainer now, I sometimes encounter totally understandable confusion regarding the regulatory requirements for overpacks, and we at BDG are always here to help if and where we can.

First of all, an overpack is just as it is defined in the regulations – an “enclosure” for completed packages, used by the consignor for added protection or convenience of handling or stowage, and there are many examples. A very common one is multiple packages shrink-wrapped to a skid to form one unit of freight to be delivered to the consignee. An overpack can also be, among other examples, something like a crate placed over a drum for added protection and ease of handling. Importantly, dangerous goods packages contained in the overpack must be properly packed, marked, labeled and in proper condition as required by the regulations – in other words, capable of being shipped individually even though they are enclosed.

A further thing to consider when defining an overpack is the intent of the shipper. If the “enclosure” is meant to remain an enclosure until it reaches the consignee, it is an overpack and (at least for IATA) must be documented with the notation “Overpack used” on the DGD. That notation indicates to the airline staff that the enclosure was not assembled simply to facilitate moving the freight to the airport, but is intended to be delivered to the consignee as one piece. While 49 CFR and IMDG regulations do not specify requirements for documenting overpacks, using the same or similar notation on a ground or vessel shipping paper can also communicate the shipper’s intent. Words such as “DO NOT DISASSEMBLE SKID” shown as additional handling instructions can also clarify.

Very important - when assembling an overpack, all DG segregation requirements applicable to the mode of transport being utilized must be adhered to.



The marking and labeling requirements for overpacks are really quite simple. All of the modal regulations state that if all required marks and labels *representative of all dangerous goods contained in the overpack* (not necessarily all the marks and labels on each package contained) are not clearly visible, they must be reproduced on the outside of the overpack along with the word “OVERPACK” marked in letters at least 12 mm high. (49 CFR confuses the issue a bit by requiring “OVERPACK” only when specification packagings are required; we recommend sticking with the internationally-agreed standard.) UN packaging specification marks must not be reproduced on the overpack as the “OVERPACK” mark indicates that packages contained within comply with the prescribed specifications. Bear in mind that “clearly visible” may be subjective to the observer; it never hurts to reproduce the marks/labels and “OVERPACK” on the outside of the overpack to facilitate acceptance if “clear visibility” is at all questionable.

The good people at IATA provide very helpful information regarding overpacks in IATA DGR 5.0.1.5, 7.1.7, 7.2.7, and 8.1.6.9.2 Step 7; along with helpful DGD examples in 8.1.K, 8.1.L, 8.1.M and 8.1.N; these clearly written references can be helpful when preparing overpacks for any mode of transport. And do note that IATA operators have additional marking/documentation requirements for consignments containing multiple overpacks – meant to facilitate their acceptance, identification, loading and notification requirements.

Overpacks are very handy and very commonly used – let us know if we can offer any further guidance or clarification!

*-Written by Sandra Harding of BDG*